June 6, 2007

<u>Filed Via Electronic Comment File Submission System</u>

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 244 12th Street SW Washington, D.C. 20554

RE: 2-1-1 Wisconsin, Inc.'s Comments Regarding the Designation of the Abbreviated Dialing Code 2-1-1, CC Docket No. 92-105

As President of its Board of Directors, and pursuant to the Commission's Notice in this docket, I submit the following comments on behalf of 2-1-1 Wisconsin, Inc. The Notice requests comments on the uses of the abbreviated dialing code "2-1-1" to allow the Commission to determine whether the dialing code is being used for the purposes outlined in the Commission's previous decision, assigning it as the code for nationwide access to information and referral services. I am proud to report that in Wisconsin, the assignment and implementation of 2-1-1 has proven to be a valuable resource for Wisconsin residents who need to be connected to various human service related organizations.

The Wisconsin implementation of this dialing code has been aided by 2-1-1 Wisconsin, Inc., an organization created to act as a clearinghouse for 2-1-1 implementation and oversight issues in Wisconsin. 2-1-1 Wisconsin, Inc. was officially recognized for this purpose in March of 2004, when the Public Service Commission of Wisconsin granted a petition to designate 2-1-1 Wisconsin, Inc. as the entity responsible for 2-1-1 implementation in

¹ The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, Public Notice, DA 07-2017 (Rel. May 7, 2007).

² Id. at 1; see also, The Use of N11 Codes and Other Abbreviated Dialing Arrangements, CC Docket No. 92-105, Third Report and Order and Order on Reconsideration, 15 FCC Rcd 16753 (2000) (2-1-1/511 Assignment Order).

Wisconsin.³ Since this designation, 2-1-1 Wisconsin, Inc. (through a Board of Directors)⁴ has taken great strides to help implement, establish and expand the reach of this important resource. 2-1-1 Wisconsin, Inc. has worked with various entities to develop a business plan that will guide the future of 2-1-1 implementation and expansion in Wisconsin. As part of that planning and implementation, 2-1-1 Wisconsin, Inc. has hired an executive director to assist and manage the day-to-day operations. These actions show that 2-1-1 Wisconsin, Inc. is expanding and planning to play an increasingly important role in the delivery of human services in Wisconsin.

While this time has been exciting for the oversight organization 2-1-1 Wisconsin, Inc., the real success stories are found within the actual providers or 2-1-1 service in Wisconsin. Currently, there are providers throughout the state of Wisconsin, making 2-1-1 service available from nearly every traditional wireline phone in the state. The following cities, located throughout the state, have 2-1-1 call centers:

- La Crosse (Great Rivers/Gunderson Lutheran)
- Madison (United Way of Dane County)
- Marinette (Infolink).
- Menasha (United Way Fox Cities)
- Milwaukee (2-1-1 @ IMPACT)
- Racine (Safehaven)
- Rhinelander (Family Resource Connection)
- Waukesha (Mental Health Association)
- Wausau (United Way Marathon County)
- Wisconsin Rapids (United Way Wood County)

Additionally, a call center is being developed and implemented in Green Bay. This regional system allows callers to obtain information from call centers that are close to home, and extremely knowledgeable about the communities where callers live.

With respect to the use of the 2-1-1 dialing code, the objective data shows that the abbreviated dialing code is being used. One call center, 2-1-1 @ IMPACT (Milwaukee), reported receiving 168,923 calls in 2003-04.

³ Request for Designation of the Telephone Number 2-1-1 in Wisconsin as a Non-emergency Information and Call Referral Number Related to Health and Human Service Matters, Public Service Commission of Wisconsin Docket 05-TI-1213, Decision (March 24, 2004).

⁴ The Board of Directors of 2-1-1 Wisconsin, Inc. includes a diverse membership of 2-1-1 service providers (from urban and rural areas) as well as representation from the various levels of state government and the telecommunications industry.

IMPACT reports that calls have been increasing since. Estimates show that, on a system-wide basis, calls to 2-1-1 in Wisconsin will soon number approximately 520,000 per year. A 2005 Census Bureau Report shows that Wisconsin had the fastest growing rate in the number of individuals living in poverty, growing from 11.8% to 14% between 2001 and 2004.⁵ This shows that, in Wisconsin, the need for 2-1-1 services will only increase over time.

The types of requests coming into Wisconsin's 2-1-1 call centers are also significant. Our call centers report that most callers request information related to housing, food, and legal and health related needs. This demonstrates that callers are using 2-1-1 to gain access to a wide variety of very important resources. And as needs continue to increase, so will our call volume.

To be sure, 2-1-1 Wisconsin Inc.'s experience is not likely a unique one. 2-1-1 call centers throughout the country have been having similar experiences and providing important services to callers throughout the country. Based on the Wisconsin experience, however, 2-1-1 Wisconsin, Inc. encourages the Commission to maintain the designation of the 2-1-1 dialing code for its current purposes. While abbreviated codes are among the scarcest numbering resources, 2-1-1 is playing an important role for many Americans.

If there are any questions about these Comments, I encourage you to contact me at (414) 256-4808.

Respectfully submitted,

Mike Davis President of Board 2-1-1 Wisconsin, Inc.

⁵ *Income, Poverty and Health Insurance Coverage in the United States: 2004*, United States Census Bureau (2005).